DOCUMENT RESUME

ED 432 793 CS 510 116

AUTHOR Lomicky, Carol S.
TITLE Analysis of High School Newspaper Editorials: Before and After "Hazelwood School District v. Kuhlmeier."
PUB DATE 1999-08-00
NOTE 22p.; Paper presented at the Annual Meeting of the Association for Education in Journalism and Mass Communication (82nd, New Orleans, LA, August 4-7, 1999).
PUB TYPE Reports - Research (143) -- Speeches/Meeting Papers (150)
EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS Case Studies; *Censorship; Content Analysis; *Editorials; High Schools; *School Newspapers; *Student Publications
IDENTIFIERS *Hazelwood School District v Kuhlmeier; Supreme Court

ABSTRACT

In "Hazelwood School District v. Kuhlmeier" (1988), the U.S. Supreme Court said public school officials can censor school-sponsored expression for legitimate educational purposes. The decision raises concerns that high school newspapers no longer will publish controversial information or criticism of school policy. This study, a content analysis case study of student-written newspaper editorials at a Midwestern public high school before and after the decision, found that more than three times as many editorials of criticism were published prior to the High Court's decision. The paper argues that since the 1988 Supreme Court decision the student journalists at this public high school are less likely to criticize school policy or discuss controversial issues in their editorials. Contains 19 references and 3 tables of data. (Author/RS)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED 432 793

Analysis of High School Newspaper Editorials: Before and After *Hazelwood School District v. Kuhlmeier*

Carol S. Lomicky, Ph.D.

Department of Communications
Thomas Hall 109B
University of Nebraska at Kearney
Kearney, NE 68849
308-865-8249
lomickyc@unk.edu

Presented to Scholastic Journalism Division
AEJMC
New Orleans, LA
August 1999

CS 510 116

BEST COPY AVAILABLE

Analysis of High School Newspaper Editorials:
Before and After *Hazelwood School District v. Kuhlmeier*

Abstract

In *Hazelwood School District v. Kuhlmeier* (1988), the U.S. Supreme Court said public school officials can censor school-sponsored expression for legitimate educational purposes. The decision raises concerns that high school newspapers no longer will publish controversial information or criticism of school policy. This study, a content analysis case study of student-written newspaper editorials at a Midwestern public high school before and after the decision, found that more than three times as many editorials of criticism were published prior to the High Court's decision. The paper argues that since the 1988 Supreme Court decision the student journalists at this public high school are less likely to criticize school policy or discuss controversial issues in their editorials

Analysis of High School Newspaper Editorials:
Before and After *Hazelwood School District v. Kuhlmeier*

In the fall of 1997 the principal of a Midwestern public high school informed the student newspaper adviser that an article about a new and controversial class scheduling plan would have to be cut or changed before it could be published. In fact, journalism educators at this school report that for the past 10 years administrators routinely preview the student newspaper before the publication is taken to the local printer. This situation is not unusual at high schools throughout the country for since the U.S. Supreme Court's decision in *Hazelwood School District v. Kuhlmeier* (484 U.S. 260, 1988), school officials increasingly are controlling and censoring otherwise constitutionally protected content ("Ten years," 1998).

Although an adviser for the school newspaper examined in this study reports that administrators seldom cut or change articles, she believes *Hazelwood*'s legacy has been that student journalists and advisers are less likely to tackle controversial topics or criticize school policy.

This case study seeks to examine the impact *Hazelwood* may have had on the content of this school-sponsored student newspaper by analyzing student-written editorials published before and after the *Hazelwood School District v. Kuhlmeier* decision on Jan. 13, 1988. Specifically, in terms of the high school under study here, was the situation described above an isolated incident? Or has the *Hazelwood* decision essentially chilled the willingness of student journalists to write about serious issues or controversial concerns?

Literature Review

In the 5-3 *Hazelwood School District v. Kuhlmeier* ruling (1988), the U.S. Supreme Court gave school officials considerable latitude in controlling the content of school-sponsored high school student publications and, thus, significantly curtailed the First Amendment protections accorded student speech. For almost 20 years prior to *Hazelwood*, an earlier Supreme Court case, *Tinker v. Des Moines Independent Community School District* (1969) was the standard for scholastic press freedom. Under *Tinker*, school officials could restrict student speech—student newspapers and yearbooks—only if the speech "materially disrupts classwork or involves substantial disorder or invasion of the rights of others" (*Tinker*, 1969, p. 513). Thus, pre-*Hazelwood* and especially in the 1970s and 1980s, student journalists had the relative freedom to publish articles on a variety of controversial topics. In fact, lower federal courts held that students had the right to run articles about teen sexuality, birth control and abortion, drug abuse and criminal conduct by students as well as commentaries critical of school policies and personnel (Simpson, 1992).

But this trend toward student press freedom abruptly ended in 1988 with the High Court's decision in *Hazelwood School District v. Kuhlmeier*. The case came about after two St. Louis-area high school journalists sued their principal for deleting two articles from the student newspaper. The principal said he had concerns about the privacy of the students and their families in the articles, one of which dealt with teen pregnancy and the other about divorce. In upholding the principal's decision, the Court said that an educator could censor material that is "ungrammatical, poorly written, inadequately researched, biased or prejudiced" or material that does not meet "high standards for...student speech" (*Hazelwood*, 1988, p. 283). The Court said officials would be allowed to curtail school-

sponsored student expression in non-public forums whenever they could demonstrate they had a "valid educational purpose" (*Hazelwood*, 1988, p. 273).

The decision also has meant that officials can censor articles on sensitive topics, if, in their judgment, the topics are unsuitable for immature audiences or are deemed to be controversial. The result of the decision: a highly vague and subjective First Amendment standard for the public high school press ("Ten years," 1998).

Although the *Hazelwood* decision requires that school officials, who wish to restrict student speech, provide a valid educational reason for their intervention, there is evidence that many administrators have interpreted the decision as providing them with a license to censor anything they choose (Corrigan, 1995). In other words, the Court essentially gave school officials—not student editors— the ultimate authority to decide what is printed when a public school newspaper is published as part of a journalism class and as long as the decision is not made for political reasons. Despite these restrictions, however, there is indication that when administrators censor, politics has a great deal to do with it. As Mark Goodman, an attorney who directs the Student Press Law Center (SPLC) in Washington D.C.[1], pointed out, the vast majority of censorship reported to the SPLC since *Hazelwood* is based on concerns that something is going to reflect negatively on the school (personal interview, Nov. 6, 1997).

Not all of the data, however, support the position that *Hazelwood* has had a negative impact on student journalism. For example, in Dickson's (1994) review of the literature, he found that studies even before the *Hazelwood* decision indicated either a significant level of prior restraint or a high potential for prior

[1]The Student Press Law Center is the only national legal assistance agency that deals with student press' freedom and rights.

restraint at many high schools. He also reported that studies soon after the ruling suggested that principals, advisers and student editors did not think the ruling would have much of an impact on scholastic press freedom. And four years after the ruling, Dickson (1994) found that among 323 high school student editors and 270 faculty advisers, there was general agreement that self-censorship was used sparingly and publication of deserving stories seldom was obstructed. Nearly ten years into the post-*Hazelwood* era, Dickson (1997) reported that most high school newspaper advisers were reading and editing copy primarily to correct mechanical and factual errors, and they infrequently removed entire articles. Dickson (1997) concluded that the amount of prior restraint at most high schools had not increased significantly since the decision. Similarly, Salomone (1994) found that although a majority of school principals reported that they knew of the ruling, only 41.2% of schools responding to her national survey reported experiencing less freedom of expression than before the ruling. Moreover, one student newspaper adviser in Seminole County, Fla., argued that *Hazelwood* has fostered a working relationship among journalism teachers and school officials—as well as responsible journalism ("Should there be limits," 1993).

But SPLC attorney Goodman believes otherwise. He argues that the *Hazelwood* decision has had a chilling effect on the ability and willingness of student journalists to write about serious issues and the problems that young people face today. Indeed, the SPLC reports that the number of legal request calls from student journalists and their advisers has continually increased since the *Hazelwood* decision. There were 605 such contacts in 1996 compared to 542 in 1995 and most of the requests concerned the issue of censorship ("Legal requests," 1997). Examples to be found in the literature (Corrigan, 1995; "Should there be limits," 1993; "Superintendent first nixes," 1994) include:

—School officials in Illinois refused to print a story about the arrest of the school superintendent for drunk driving. In defending the administrator's actions, the principal said that a school newspaper should be positive in focus and it should build pride in the school.

—A principal in Indiana censored a story detailing how the girls' tennis coach improperly had pocketed more than $1,000 from team members. The parties agreed that the story was accurate. Also, it was later learned that school officials had used the story to force the coach into resigning by threatening to publish the news story that detailed his improprieties.

—A principal in North Dakota would not allow the newspaper to publish a story about a former teacher who was dying of Lou Gherig's disease until a quote was altered. The objectionable quotation, as told by the source to the student reporter, was "I know I look like hell, but I feel better." It was changed to "I know I look bad."

—In Ohio, a superintendent censored an advertisement a local school board candidate submitted to the student newspaper. After the ad was withdrawn from publication, the student editor wrote an editorial criticizing the school official's act of censorship.

—The principal at an Alaska junior high school censored an editorial complaining that teachers smoking behind the music room made it difficult for the orchestra members to practice. He told the adviser the story would be embarrassing.

Sometimes though students fight the censorship. For example, a student editor sued the school for $50,000 after officials censored a story about a shoplifting incident that occurred during a school-sponsored ski trip ("Middle school," 1997). The student editor argued that the school has not shown a legitimate educational concern to justify the prior restraint.

Students in Maryland sought legal counsel following the principal's efforts to block distribution of their high school newspaper because of a headline. The principal, who did not object to the story content, said the headline was libelous ("Paper distribution," 1997). The principal said students could distribute the newspaper if they would change the headline. The students refused and protested the censorship by pulling their stories from the paper. The principal then refused to publish the newspaper because he said the blank pages would be embarrassing. He later attempted a compromise by publishing a four-page special senior section, but the students are appealing the principal's actions to an associate superintendent through their lawyers ("Paper distribution," 1997).

At a St. Petersburg, Fla. high school, a new policy was established that requires prior review by school officials before controversial topics can be published in the student newspaper ("Reporter saves," 1998). This action followed an earlier conflict between student journalists and school administrators, who refused to distribute the newspaper because of concerns over several articles. When the *St. Petersburg Times* published a story about the censorship, the principal relinquished—under the condition that a letter explaining his views on the matter also be published. Already the new prior review policy has led to several canceled stories ("Reporter saves," 1998).

As Dvorak and Dilts (1992) reported in their review of the literature, commentary about the effect of *Hazelwood* on high school journalism has been prolific. And much of the discussion has been negative. Hentoff's (1988) sentiment, for instance, could be characterized as typical of much of the commentary that followed the decision. As he noted, it is important for students to have a free press while in high school so that students will be better prepared for real life journalism (Hentoff, 1988). Further, he suggested that many principals across the country have been only too happy to finally have gained

control of the student press (Hentoff, 1988). Also critical of the decision have been high school newspaper advisers, who generally see the ruling as providing a means by which school officials can put a lid on controversy—or any news that administrators feel could put the school in a bad light.

Indeed, in his minority opinion in the *Hazelwood* ruling, Justice William J. Brennan Jr. noted that censorship:

> ...in no way furthers the curricular purposes
> of a student newspaper unless one believes that
> the purpose of the school newspaper is to teach students
> that the press ought never report bad news, express
> unpopular views, or print a thought that might upset
> its sponsors. (*Hazelwood School District v. Kuhlmeier*,
> 1988, p. 299)

The purpose of this study is to identify the impact—if any—the *Hazelwood* decision has had on one public high school newspaper especially in the context of Brennan's concerns about censorship. Specifically, by examining the content of student-written editorials before and after the *Hazelwood* decision, this study seeks to determine if the content of the student newspaper at the public high school under study has changed discernibly following the High Court ruling. As such, five hypotheses are proposed:

1. Editorial typologies written before the 1988 *Hazelwood* Supreme Court decision will be different than the editorial typologies written after the decision.

2. The number of editorials of criticism will have decreased following the *Hazelwood* decision.

3. The number of editorials critical of school policy will have decreased following the *Hazelwood* decision.

4. The number of editorials of praise will have increased following the *Hazelwood* decision.

5. The number of editorials dealing with controversial topics will have decreased following the *Hazelwood* decision.

Methodology

Student-written newspaper editorials published at a Midwestern public high school before and after the January 13, 1988 *Hazelwood School District v. Kuhlmeier* U.S. Supreme Court decision provided the unit of analysis for this study. The student newspaper typically is produced about every three weeks from September to May as part of the journalism classes; on average, about 14 newspapers are published each year. Newspaper editorials were randomly sampled from all the newspapers published each academic year from 1980 through 1996—eight years before and eight years after the *Hazelwood* ruling. The pre-*Hazelwood* sample began with the first newspaper published during the 1980 academic year and continued for each year until the December, 1987 issue. The post-*Hazelwood* sample began with the Jan. 19, 1988 edition and continued through the last issue produced in the 1996 school year. The time frame was selected because it provided a means by which to draw samples for the same number of years both prior to and after the court rendered its decision. The coders used a systematic random sample to select 144 newspapers until 72 issues published before and 72 issues published after the court decision were drawn. Two publications in the pre-*Hazelwood* sample did not contain editorials. Thus, the coders examined a total of 142 editorials—70 from newspapers published before and 72 after the court decision. The researcher determined the number of editorials to include in the sample so that the total would account for roughly one newspaper per month for each of the eight years studied.

To determine if the High Court decision may have influenced student-written editorials, the coders first examined the editorials to determine their typology or category typē. Editorial typology was based on Ward's editorial category distinctions (1969) with each editorial coded as one of five types: *criticism, support/praise, entertainment, historical*, and *appeal to a cause*. For example, an editorial denouncing school officials for inadequate monitoring of the hallways between classes was considered an editorial of criticism. On the other hand, an editorial lauding students for school spirit during homecoming week constituted an editorial of praise. Humor, inspirational and seasonal pieces were coded as entertainment, while an editorial of appeal stressed action for a cause. For instance, an editorial calling on students to become more involved in local volunteer activities would be a cause-appealing editorial. Historical editorials provided a retrospective on a given topic. Editorials that did not fit any of the categories were coded as "other". For statistical purposes, the categories of editorial typologies were mutually exclusive, and, thus, coders evaluated editorials in terms of the over-riding theme.

In order to determine hypothesis 3, which predicts that editorials critical of school policy will have decreased following the decision, the coders also analyzed editorials in terms of geographic scope: *world, nation, state, community*, and *school*. For example, if the main focus of the editorial was about school policy or campus events, it was coded as "school" while topics dealing with international affairs, U.S. politics, and/or hometown issues were coded in each of the respective categories. For statistical purposes, the categories representing geographic scope were mutually exclusive. Thus, if the topic incorporated more than one geographic category or the geographic scope of the editorial was indeterminate, it was categorized as "other". The researcher also qualitatively examined the editorials in terms of editorial topic.

Two coders performed the analysis. A subsample of editorials to establish intercoder reliability also was coded. Intercoder agreement for the editorial typology and geographic scope was 93 percent and 76 percent, respectively. A chi-square test for independence and standardized residuals for each of the editorial typologies were calculated for data analysis.

Findings

Three of the five hypotheses were supported. A discussion of the findings in terms of each hypothesis follows:

The first hypothesis, which expected that editorial typologies written before the 1988 *Hazelwood* Supreme Court decision would be different than the editorial typologies written after the decision, is supported. As Table 1 shows, the typology of editorials written pre-*Hazelwood* was significantly different than those written post-*Hazelwood*, $X^2(5, n=142) = 44.41$, $p < 0.005$. For example, there were 40 editorials of criticism written prior to the *Hazelwood* ruling, and following the decision there were only 12 editorials of criticism. There also were considerably more editorials written to entertain and appeal to causes when comparing the pre and post-*Hazelwood* samples. Prior to the decision, there were 4 editorials of entertainment written, which compares to 19 such editorials that appeared in the newspaper following the ruling. And there were no cause-appealing editorials written before the *Hazelwood* decision, but 20 such editorials were published afterward. No historical editorials were published in either the pre or post-*Hazelwood* sample and, thus, that category has been eliminated from tables 1 and 2.

Table 1

Editorial Typology Before and After *Hazelwood* by Frequency and Percentage

Editorial Typology	**Pre-*Hazelwood***	**Post-*Hazelwood***	**Totals**
Criticism	40 (57%)	12 (17%)	52
Praise	15 (21%)	12 (17%)	27
Entertainment	4 (6%)	19 (26%)	23
Cause Appealing	00 (00%)	20 (28%)	20
Other	11 (16%)	9 (12%	20
Total	N=70	N=72	142

X^2 (5,n=142)=44.41,

p<0.005

The second hypothesis that predicted the number of editorials of criticism would have decreased following the *Hazelwood* decision also is supported. As noted above, of the 70 editorials published before *Hazelwood,* there were 40 editorials of criticism (57%). After the *Hazelwood* decision, the newspaper had published only 12 editorials of criticism (17%). As shown in Table 2, the category, editorials of criticism, was a major contributor to the significant X^2 value. (Standardized residuals greater than 2.00 in absolute value are considered significant.) Moreover, the residuals indicate that there were significantly more editorials of criticism preceding the *Hazelwood* case than following it.

Table 2

Standardized Residuals for Editorial Typology Before and After *Hazelwood*

Editorial Typology	**Pre-*Hazelwood***	**Post-*Hazelwood***
Criticism	2.74	-2.74
Praise	.55	-.53
Entertainment	-2.11	2.02
Cause Appealing	-3.16	3.16
Other	.32	.32

Although not hypothesized, findings also indicate that editorials of entertainment and those written to appeal to causes also were major contributors to the significant X value. For example, as shown in Table 2, significantly fewer editorials of entertainment or those that appealed to causes were written in the pre-*Hazelwood* years while significantly more in each of the two categories followed the High Court decision.

The third hypothesis, which stated that the editorials critical of high school administration or policy would decrease since the *Hazelwood* decision, is not supported. And although the number of these editorials had declined following the *Hazelwood* decision, the decrease was not significant, $X^2(5, n=52) = 7.64$, $p < 0.05$, as illustrated in Table 3. Of the 40 pre-*Hazelwood* editorials of criticism, 23 of them were about school-related issues. Following *Hazelwood,* there were 12 editorials of criticism, all of which related to school concerns.

Table 3

Frequency and Percentage of Editorials of Criticism by Geographic Scope

Geographic Scope	Pre-*Hazelwood*	Post-*Hazelwood*	Totals
School	23(44%)	12 (23%)	35
Community	1(2%)	0 (0%)	1
State	1 (2%)	0 (0%)	1
Nation	11 (21%)	0 (0%)	11
World	3 (6%)	0 (0%)	3
Other	1 (2%)	0 (0%)	1
Total	N=40	N=12	52

X^2 (5,n=52)=7.64,

$p < 0.05$

Noteworthy, however, is that a qualitative analysis of the editorials of criticism following *Hazelwood* reveals that among those that were critical of school policy, many dealt with what could be viewed as safer issues. These included the concern about crowded hallways, the school not providing enough activities for homecoming week as well as parking issues. By contrast, the editorials critical of school policy that were published prior to *Hazelwood* included criticisms of substitute teachers as well as administrative policies regarding semester test dates, general studies requirements, a new athletic conference, police stake-outs, t-shirt banning, student locker searches, and newly-implemented rules regarding detention. Also of the 12 post-*Hazelwood* editorials of criticism relating to school issues, 5 editorials were critical of students; none of the editorials written prior to the decision criticized students.

The fourth hypothesis, which expected that the number of editorials of praise would increase following *Hazelwood,* also is not supported. Prior to *Hazelwood,* there were 15 editorials of praise, which represents 21% of the total, and after *Hazelwood,* this newspaper had published 12 editorials of praise (17%). Of the 15 pre-*Hazelwood* editorials of praise, 12 were on topics that were school-related. All 12 of the post-*Hazelwood* editorials of praise dealt with school-related topics. But a qualitative analysis of the topics discussed in the editorials of praise suggests that the *Hazelwood* decision may have affected editorial content as well. Based on the views expressed in the editorials of praise following *Hazelwood,* student journalists appear to be unwilling to oppose administration in their commentary. For example, editorials of praise following *Hazelwood* tend to support school policy and programs including a year-round school proposal, a teacher adviser group program, and school spirit. Even the topic of dress codes, often a subject student writers like to denigrate, was commended in the post-*Hazelwood* sample as preparing students for the real world. By contrast, pre-*Hazelwood,* editorials of praise tended to commend students more and administrators or school policy less. For example, students were lauded for academic and athletic accomplishments, their behavior at the junior/senior prom, and for their ability to deal with inadequate parking. Even the "Rowdies," an informal—and often controversial—male sports cheering squad, drew praise from one student editorial writer. Only two editorials of praise written in the pre-*Hazelwood* years commended school policy: one for a new senior graduation option and the other for a proposed student lounge.

Hypothesis 5 predicted that the number of articles about controversial issues would decrease since the *Hazelwood* decision. This hypothesis is supported although the number of controversial issues discussed in the samples both before and after *Hazelwood* was small. Before *Hazelwood,* there were 7 editorials about

such topics as drug problems, theft at the school, sex and teen pregnancy. This represents 10% of the total sample. Following *Hazelwood,* however, only one editorial about a sensitive topic was found in the sample (1%). Moreover, this editorial, which discussed a proposed high school sex education program, praised school policy on the issue. In fact, the editorial denounced community critics of the school program while it commended the school administration.

There were no cause-appealing editorials found in the pre-*Hazelwood* sample and, as noted, no historical editorials were found for any of the years under study.

Conclusions

A case study of one school newspaper's editorial content cannot be regarded as proof that the*Hazelwood v. Kuhlmeier* decision has chilled the high school press. Nonetheless, the conclusions to be drawn from a case study content analysis can be valuable and insightful (Stempel, 1989). Indeed, as these findings suggest, the student journalists at the Midwestern public high school examined here seem much less willing to criticize school policies or tackle controversial subject matter in their writing since the *Hazelwood* decision. Overall, the types of student-written editorials published pre-*Hazelwood* were significantly different than those written after the High Court case (X^2 [5, n=142] = 44.41, $p < 0.005$). What is more important, there were more than three times the number of editorials of criticism published before the *Hazelwood* decision than there were following (57% of the total before and 12% after the ruling). This seems to suggest a reluctance among students to take on administration or school policy in their commentaries following the Court decision. And although the number of editorials of praise did not increase after the *Hazelwood* decision, an analysis of the topics students selected to praise suggests that in the years following

Hazelwood, students are more inclined to praise school policy and administration than they were before the decision.

In the same vein, an examination of topics in the editorials of criticism following *Hazelwood* also suggests a certain timidity among students writers. For even when the criticisms related to school policy, the issues could hardly be considered controversial—parking problems, crowded hallways, the need for more homecoming activities. By contrast, students took on what might be considered tougher subject matter in the pre-*Hazelwood* sample including criticisms of substitute teachers as well as an assortment of administrative policies regarding general studies requirements, police stake-outs, t-shirt banning, student locker searches, and detention regulations. Also of the 12 post-*Hazelwood* editorials of criticism relating to school issues, 5 editorials criticized students.

It also is interesting to compare the numbers of pre and post-*Hazelwood* editorials of entertainment (4 before and 19 following) and cause-appealing editorials (none before and 20 following). This might suggest that, since the ruling, students are more inclined to select topics of entertainment or write about causes worthy of support because such subjects would be less likely to offend administrators in the pre-publication review process.

Certainly, the willingness of the student journalists to criticize school policy or discuss controversial issues in their newspaper editorials may be explained by a variety of factors other than the Supreme Court decision in *Hazelwood*. Subjects about which students select to editorialize frequently relate to the shifting currents of news. And since 1980 many different students have served as newspaper editors at this study's high school. Some of the administrators and newspaper advisers have changed as well. Thus, the argument here is not that *Hazelwood* serves as a direct cause for the changes found in editorial content. But rather these findings do appear to corroborate the

literature that suggests: *Hazelwood* has given school administrators a means by which to butcher and censor articles when they believe publication of the information may cause public controversy or upset school board members. Before *Hazelwood*, the principal of the high school in this study could have restricted the article about the controversial class scheduling plan only if the writing threatened to disrupt the classes or individuals were being intimidated in some way. After *Hazelwood*, the administrator was able to control information that most journalists likely would deem newsworthy. In the end, the offending article was eventually published but only after student editors—acquiescing to the principal's demands—omitted one quote and changed some of the information.

The findings from this study also add to the argument that the *Hazelwood v. Kuhlmeier* (1988) has implications for the instruction of public high school journalism. Namely, that journalism teachers, advisers and students need to clearly understand the role of the student publications at their high schools. Are the newspapers truly mediums of news and information of interest to the students, or are the publications more often than not viewed by administration as a vehicle to present the best possible image of the school? Certainly, more research is needed to determine how journalism educators have been prepared to handle incidents of prior restraint, how administrators are implementing prior restraint policies, and how educators are or can turn acts of censorship into a teaching strategy about the First Amendment in the public high school setting, Also, further research involving other public high schools across the country is needed to determine the extent to which *Hazelwood* has chilled the student press as Justice Brennan, in his dissenting opinion, so aptly forewarned.

References

Corrigan, D. (1995). Student press supporters hope to end official's abuse of *Hazelwood* ruling. St. Louis Journalism Review, 24(173), 10-12,

Dickson, T. (1994). Self-censorship and freedom of the public high school press. Journalism Educator, 49(3), 56-64.

Dickson, T. (1997). Preparing scholastic press advisers for roles after *Hazelwood* decision. Journalism and Mass Communication Educator, 51(4), 4-15.

Dvorak, J. & Dilts, J.P. (1992). Legacy of *Hazelwood v. Kuhlmeier*: Academic freedom vs. administrative authority. Journalism Educator, 47(3), 3-12.

Hazelwood School District v. Kuhlmeier, 484 U.S. 260 (1988).

Hentoff, N. (1988). The real world of high school journalists. Village Voice, 33(7), 42.

Legal requests from high schools reach record high at SPLC in '96. (1997, Fall). Student Press Law Center Report, 18(3), 3.

Middle school editor sues for $50,000. (1997, Fall). Student Press Law Center Report, 18(3), 11-12.

Paper distribution halted for ethics headline. (1997, Fall). Student Press Law Center Report, 18(3), 7, 37.

Principal wrong in censoring reviews. (1993-94, Winter). Student Press Law Center Report, 15(1), 15.

Reporter saves seized newspapers. (1997-98, Winter). Student Press Law Center Report, 14(1), 23.

Salomone, R.C. (1994). The impact of *Hazelwood v. Kuhlmeier* on local policy and practice. NASSP Bulletin, 78(566), 47-62.

Should there be limits on the content of student newspapers? (1993) NEA Today, 11(9), 39.

Simpson, M. C. (1992). How free is the student press? NEA Today, 11(4), 25.

Stempel III, G. H. (1989). Content analysis. In G.H. Stempel and B. H. Westley, (Eds.), Research Methods in Mass Communication, 2d ed. (p. 139). Englewood Cliffs: Prentice Hall.

Superintendent first nixes ad, then censors student's editorial. (1993-94, Winter). Student Press Law Center Report, 15(1), 16.

Ten years after *Hazelwood* decision censorship threat continues to grow. (1997-98, Winter). Student Press Law Center Report, 14(1), 3.

Tinker v. Des Moines Independent Community School District, 393 U.S. 508 (1969).

Ward, W.G. (1969). The Student Journalist and Writing Editorials. New York: Richards Rosen Press.